

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

v.

SANDEEP GROVER,
ABHIJEET SINGH, and
SHIKHA SEHGAL,

Defendants.

INDICTMENT

24 Cr. 46

COUNT ONE
(Major Fraud Against the United States)

The Grand Jury charges:

1. From at least in or about April 2020 through at least in or about June 2021, in the Southern District of New York and elsewhere, SANDEEP GROVER, the defendant, willfully and knowingly executed, and attempted to execute, a scheme and artifice with the intent to defraud the United States, and to obtain money and property by means of false and fraudulent pretenses, representations, and promises, in a grant, contract, subcontract, subsidy, loan, guarantee, insurance, and other form of Federal assistance, including through an economic stimulus, recovery and rescue plan provided by the Government, the value of which was \$1,000,000 and more, to wit, GROVER engaged in a scheme to obtain more than \$13 million in Government-guaranteed loans by means of false and fraudulent pretenses, representations, and documents, for companies wholly or partially controlled by GROVER and others, through a loan program of the U.S. Small Business Administration (the "SBA") designed to provide relief to small businesses during the COVID-19 pandemic, namely the Paycheck Protection Program (the "PPP").

(Title 18, United States Code, Sections 1031 and 2.)

COUNT TWO
(Conspiracy to Commit Wire Fraud)

The Grand Jury further charges:

2. From at least in or about April 2020 through at least in or about June 2021, in the Southern District of New York and elsewhere, SANDEEP GROVER, ABHIJEET SINGH, and SHIKHA SEHGAL, the defendants, and others known and unknown, willfully and knowingly combined, conspired, confederated, and agreed together and with each other to commit wire fraud, in violation of Title 18, United States Code, Section 1343.

3. It was a part and an object of the conspiracy that SANDEEP GROVER, ABHIJEET SINGH, and SHIKHA SEHGAL, the defendants, and others known and unknown, knowingly having devised and intending to devise a scheme and artifice to defraud, and for obtaining money and property by means of false and fraudulent pretenses, representations, and promises, would and did transmit and cause to be transmitted by means of wire, radio, and television communication in interstate and foreign commerce, writings, signs, signals, pictures, and sounds for the purpose of executing such scheme and artifice, which affected a financial institution, in violation of Title 18, United States Code, Section 1343, to wit, GROVER, SINGH, and SEHGAL agreed to make and caused to be made false representations to a bank in order to obtain PPP loans, and sent and received, and caused others to send and receive, emails and other electronic interstate communications, to and from the Southern District of New York and elsewhere, in furtherance of that scheme.

(Title 18, United States Code, Section 1349.)

COUNT THREE
(Aggravated Identity Theft)

The Grand Jury further charges:

4. In or about June 2020, in the Southern District of New York and elsewhere, SANDEEP GROVER, the defendant, knowingly transferred, possessed, and used, without lawful authority, a means of identification of another person, during and in relation to a felony violation enumerated in Title 18, United States Code, Section 1028A(c), to wit, GROVER used the name and identity of another person during and in relation to the major fraud against the United States and conspiracy to commit wire fraud violations charged in Counts One and Two of this Indictment.

(Title 18, United States Code, Sections 1028A(a)(1),
1028A(b), and 2.)

FORFEITURE ALLEGATIONS

5. As a result of committing the offenses alleged in Counts One and Two of this Indictment, SANDEEP GROVER, the defendant, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 982(a)(2)(A), any and all property constituting, or derived from, proceeds obtained directly or indirectly, as a result of the commission of said offenses, including but not limited to a sum of money in United States currency representing the amount of proceeds traceable to the commission of said offenses and the following specific property:

- a. One Single-Family Residence at 2 Heathcote Ct, Shirley, New York 11967,
and
- b. One Single-Family Residence at 382 Cheese Hill Rd, Preston Hollow, New
York 12469.

6. As a result of committing the offense alleged in Count Two of this Indictment, ABHIJEET SINGH and SHIKHA SEHGAL, the defendants, shall forfeit to the United States,

pursuant to Title 18, United States Code, Section 982(a)(2)(A), any and all property constituting, or derived from, proceeds obtained directly or indirectly, as a result of the commission of said offense, including but not limited to a sum of money in United States currency representing the amount of proceeds traceable to the commission of said offense.

SUBSTITUTE ASSETS PROVISION

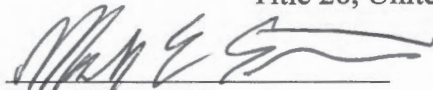
7. If any of the above-described forfeitable property, as a result of any act or omission of the defendants:

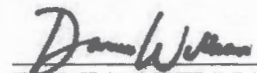
- c. cannot be located upon the exercise of due diligence;
- d. has been transferred or sold to, or deposited with, a third person;
- e. has been placed beyond the jurisdiction of the Court;
- f. has been substantially diminished in value; or
- g. has been commingled with other property which cannot be subdivided

without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p) and Title 28, United States Code, Section 2461(c), to seek forfeiture of any other property of the defendants up to the value of the above forfeitable property.

(Title 18, United States Code, Section 982;
Title 21, United States Code, Section 853; and
Title 28, United States Code, Section 2461.)


FOREPERSON


DAMIAN WILLIAMS
United States Attorney